

(signed April 27, 2000)

MEMORANDUM

SUBJECT: Public Review of the Draft Handbook of Groundwater Policies  
for RCRA Corrective Action

FROM: Elizabeth A. Cotsworth, Director  
Office of Solid Waste

TO: RCRA Corrective Action Stakeholders

Attached for your review and comment is the draft Handbook of Groundwater Policies for RCRA Corrective Action. This Handbook is one part of the RCRA Cleanup Reforms that EPA announced on July 8, 1999. You can learn more about those reforms by referring to <http://www.epa.gov/epaoswer/osw/factsheet1.pdf>. EPA is writing this Handbook to help bring together in one place all its existing policies applicable to groundwater protection and cleanup at RCRA corrective action facilities. Stakeholders should view the policies in this Handbook as a guide on how EPA implements RCRA corrective action in the absence of applicable state requirements or guidance. However, since most states and territories are authorized to carry out facility-wide RCRA corrective action in lieu of EPA, users of the Handbook should be aware of applicable state requirements and guidance prior to conducting cleanups.

Each topic in this Handbook is already addressed in an EPA guidance document, directive or memorandum. This Handbook serves to summarize our current guidance and recommendations, and provide further clarification of EPA's groundwater policies. Many of the policies addressed in the Handbook come from the May 1, 1996 Advanced Notice of Proposed Rulemaking (ANPR, available at <http://www.epa.doc/fedrgstr/EPA-WASTE/1996/May/Day-01/pr-547.pdf>), which serves as the primary corrective action implementation guidance. For that reason, the ANPR, especially Section III, is a key reference for many of the topics in this Handbook. Section IV of the ANPR requested comments on a number of topics addressed in this Handbook, such as the point of compliance. We welcome additional input on groundwater issues raised for comment in the ANPR. As discussed in the Overview section, once the Handbook is finalized, EPA will update this Handbook as policies evolve.

This draft was developed jointly by staff from the Corrective Action Programs Branch in the Office of Solid Waste and EPA's Region III Waste and Chemical Management Division. The developers attempted to make the document very user friendly with numerous "hyperlinks" to quickly take you to topics within the document or references outside the document. Therefore, if you are reading a hard copy of the draft Handbook, we urge you to access an electronic copy at by clicking "Public Review of Draft Handbook of Groundwater Policies for RCRA Corrective Action" at <http://www.epa.gov/correctiveaction> to take full advantage of the "hyperlinks" feature.

While all comments on the Handbook are welcome and appreciated, provided below are several suggestions to help focus your review:

- Indicate additional topics, if any, and associated questions that you believe should be addressed in the Handbook.
- For existing topics, identify questions and/or answers you believe should be added, deleted, or modified. Make sure to let us know if you believe that an existing question or answer is not clear. Please provide suggested wording along with your reasons for the suggested change.
- Indicate other references you believe should be included.
- Please identify additional key terms you believe are important to include in the glossary.
- Please let us know if you found the internal "hyperlink" feature useful.
- Lastly, please suggest format changes to make it easier for you to find information and answers to your questions.

Information about this Handbook and other efforts associated with the RCRA Cleanup Reforms can be found in a March 24, 2000 Federal Register notice by clicking the highlight "Schedule Announced for RCRA Corrective Action Guidance Documents" at <http://www.epa.gov/correctiveaction>. Please follow the instructions outlined in that Federal Register notice for submitting comments on this Handbook. **The official 60 day comment period for this Handbook starts on May 3, 2000 and ends on July 2, 2000.**

Please contact the RCRA Hotline at 800/424-9346 (TDD 800/553-7672 for hearing impaired) for general information or to obtain copies of this Handbook, if you can't access <http://www.epa.gov/correctiveaction>, or to get copies of other RCRA Cleanup Reform guidance documents when they become available. For more detailed information on specific aspects pertaining to this Handbook, contact Guy Tomassoni at 703/308-8622 ([tomassoni.guy@epa.gov](mailto:tomassoni.guy@epa.gov)). For more information on the RCRA Cleanup Reforms, contact Kevin Donovan at 703/308-8761 ([donovan.kevin-e@epa.gov](mailto:donovan.kevin-e@epa.gov)).

Thank you very much for your time and effort in conducting your review and submitting comments.

Attachment